

Statement on E-Cigarettes
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I am Dr. Joel L. Nitzkin. I am a public health physician currently serving as Senior Fellow for Tobacco Policy for the R Street Institute. The comments I offer here today are entirely my own and do not necessarily reflect the policy stance of R Street, the American Association of Public Health Physicians, or any other organization with which I am or have been associated.

My purpose today is to urge FDA to consider the potential benefits of e-cigarettes, and to consider tobacco cigarettes as the primary basis for comparison when dealing with issues of toxicity and addictiveness.

The most recent CDC and other data demonstrate the potential for e-cigarettes to be the ideal tobacco harm reduction product. They satisfy large numbers of smokers without increasing total use of nicotine by teens. The most recent CDC data shows use of nicotine delivery products (defined as use of cigarettes and/or e-cigarettes) by middle and high school students **declining** from 2011 to 2013. These and other data strongly suggest that **e-cigarettes lead teens away from smoking with remarkably little recruitment of non-smoking teens and remarkably little transition from e-cigarettes to tobacco cigarettes for teens or adults.** These findings were reinforced by data presented at the recent SRNT conference.

The attitude of almost the entire public health community, including FDA, appears to be one of extreme distrust of what they refer to as the “tobacco industry.” This results in requirements for proof of safety and requirements relative to impact on non-users so extreme that such proof is a near impossibility. Studies and survey data published to date are dismissed as insufficient for policy and regulation.

I would like you to consider the possibility that this excessively negative attitude by FDA and others in the public health community might reflect, at least in part, something other than zeal to protect the health of the public.

Decades ago, leaders of the tobacco control movement discovered that transforming tobacco control from a public health enterprise to a moral crusade against the evil tobacco companies resulted in substantially increased political and donor support and enhanced recruitment of energetic volunteers. This, in turn, led to the goal of “a tobacco-free society,” a goal interpreted as ruling out any consideration of any non-pharmaceutical nicotine delivery product in any public health initiative.

Tobacco harm reduction is so foreign to the thinking of FDA and other tobacco control authorities that they have been unwilling to date to actively consider and extensively research the potential benefits of vapor devices.

My question is this: Does FDA share this commitment to a tobacco-free society, and, if so, what does this imply for consideration of the potential benefits of e-cigarettes?

My handout for today's presentation includes links to papers making the case in favor of e-cigarettes and to Internet resources addressing misrepresentation of survey and study data by federal and other tobacco control authorities.

Thank you

Journal References:

(both references also provide detail on the R Street Institute, and Dr. Nitzkin's role as Fellow)

Nitzkin JL. The case in favor of e-cigarettes for tobacco harm reduction. International Journal of Environmental Research and Public Health 2014;11:6459-71. <http://www.mdpi.com/1660-4601/11/6/6459>.

Nitzkin JL. E-cigarettes: A life-saving technology or a way for tobacco companies to re-normalize smoking in American society? FDLI's Food and Drug Policy Forum 2014 30 June;4(6):1-17. <http://www.rstreet.org/wp-content/uploads/2014/07/20140630FDLI-EcigForum.pdf>

Web Site References:

The misrepresentation of survey and study data by CDC and other public health authorities is so far out of hand that there are blogs by skilled public health professionals posting examples of distortions and lies by CDC, the voluntaries and other tobacco control authorities. The most prominent of these are "The Rest of the Story" blog (<http://tobaccoanalysis.blogspot.com/>) posted by Dr. Mike Siegel of Boston University, a physician who had once been on the staff of the CDC Office on Smoking and Health, and the "Tobacco Truth" blog (<http://rodutobaccotruth.blogspot.com/>) by Dr. Brad Rodu, an oral and maxillofacial pathologist who dedicated his early career to the study of oral cancer, only to discover that the link to smokeless tobacco was grossly exaggerated.

www.ecigarette-research.org is a website run by an international team led by Dr. Konstantinos Farsalinos, a cardiology researcher with appointments in Athens and Brussels. This site references and comments on e-cigarette-related research, favorable and unfavorable, published since 2013.

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